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August 17, 2023

By ECF

Hon. Victor Marrero United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 08/18/2023

Re: United States v. Narek Marutyan, et al., 20 Cr. 652 (VM)

Dear Judge Marrero:

This letter is respectfully submitted to request that the Court extend the deadline to submit any objections to the draft Presentence Report currently due August 18, 2023, by 14-days to September 1, 2023.

The undersigned is preparing for a three defendant murder-for-hire trial, *United States v. Yu et al.*, 22 Cr. 208 (CBA) pending in the Eastern District of New York, scheduled to begin on September 11, 2023, and has not been able to meet with Mr. Marutyan as we prepare and file extensive submissions in reference to the EDNY case. The requested extension will permit us to meet with Mr. Marutyan and file any objections on his behalf.

Probation Officer Robert Flemen and Assistant United States Attorney Emily Deininger have no objection to the instant request.

Thank you for your consideration.

Respectfully submitted,

/s/ James Kousouros
James Kousouros, Esq.
Counsel for Narek Marutvan

c.c.

Emily Deininger Assistant United States Attorney

Robert Flemen Probation Officer

